

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
CLAY A. PLUMMER
Nevada Bar No. 6778
Special Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336
clay.plummer@usdoj.gov
Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FERNANDO ORTEGA-HERNANDEZ,
aka "Ortega Fernando,"
aka "Hernandez Fernando,"

Defendant.

Case No. 2:24-mj-00639-MDC

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Clay Plummer, Special Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Rick Mula, Assistant Federal Public Defender, counsel for defendant FERNANDO ORTEGA-HERNANDEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 15th ^{October} day of ~~July~~, 2024.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney


/s/

Assistant Federal Public Defender
Counsel for Defendant
FERNANDO ORTEGA-
HERNANDEZ


/s/ Clay Plummer

CLAY A PLUMMER
Assistant United States Attorneys

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**Order Directing Probation to
Prepare a Criminal History Report
[Proposed]**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 17th day of October 2024



HON. MAXIMILIANO D. COUVILLIER, III
UNITED STATES MAGISTRATE JUDGE